

IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF SOUTH CAROLINA

USAA CASUALTY INSURANCE CO.,)	3:17-1294-TLW
)	
Plaintiff,)	DEFENDANT LASKO PRODUCTS, INC. n/k/a LASKO PRODUCTS, LLC'S ANSWERS TO LOCAL RULE 26.01 INTERROGATORIES
vs.)	
LASKO PRODUCTS, INC.,)	
)	
Defendant.)	

Pursuant to Local Civil Rule 26.01 for the U.S. District Court for the District of South Carolina, Defendant Lasko Products, Inc. n/k/a Lasko Products, LLC ("Lasko"), by and through counsel, makes the following disclosures:

A. State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

Upon information and belief, the present matter has been filed by Plaintiff USAA Casualty Insurance Company ("USAA") as the subrogee of James and Theresa Vola to the extent of USAA's payments under a policy of insurance issued by USAA to the Volas for damages alleged to have been caused by a fire on January 21, 2016, at the Volas' home located at 38 Winding Maple Court, Blythewood, South Carolina 29016. However, Lasko is not aware of any person or legal entity who may have a subrogation interest in the claims asserted by USAA in this action.

B. As to each claim, state whether it should be tried jury or nonjury and why.

Lasko is aware that USAA has demanded a jury trial on all causes of action triable by a jury.

C. State whether the party submitting these responses is publicly-owned company and separately identify (1) any parent corporation and publicly-held corporation owning a ten percent (10%) or more of the party's stock; (2) each publicly –owned company of which it is a parent; and (3) each publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.

Lasko is not a publicly-owned company and does not have any parent corporation or publicly-held corporation owning a ten percent (10%) or more of its stock. Further, Lasko is not a parent of any publicly-owned company, and Lasko does not own ten percent (10%) or more of the outstanding shares in any publicly-owned company.

D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

Lasko believes that this action has been removed to the proper division of this district under Local Civil Rule 3.01(A)(1) for the U.S. District Court for the District of South Carolina, as the division where a substantial part of the events or omissions giving rise to the claim occurred. Specifically, this action is properly in the Columbia Division of the U.S. District Court for the District of South Carolina because this action pertains to a fire of January 21, 2016, at the home of James Vola and Theresa Vola located at 38 Winding Maple Court, Blythewood, Richland County, South Carolina.

E. Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action.

Upon information and belief, no.

F. If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

Defendant Lasko Products, Inc. is now known as Lasko Products, LLC.
Counsel will accept service of an amended summons and pleading reflecting the correct identification.

G. If you contend that some other person or legal entity is, in whole or in party, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

N/A

This the 19th day of May, 2017.

GOLDBERG SEGALLA LLP

/s/ David G. Harris II
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*Attorney for Defendant Lasko Products, Inc. n/k/a
Lasko Products, LLC*

CERTIFICATE OF SERVICE

I hereby certify that on this date, a copy of the foregoing DEFENDANT LASKO PRODUCTS, INC. n/k/a LASKO PRODUCTS, LLC'S ANSWERS TO LOCAL RULE 26.01 INTERROGATORIES was filed with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent by operation of the Court's CM/ECF system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

The undersigned attorney hereby further certifies that a copy of the foregoing DEFENDANT LASKO PRODUCTS, INC. n/k/a LASKO PRODUCTS, LLC'S ANSWERS TO LOCAL RULE 26.01 INTERROGATORIES was served upon all counsel of record via first-class mail, postage prepaid, addressed as follows:

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Attorney for Plaintiff

This the 19th day of May, 2017.

GOLDBERG SEGALLA LLP

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 Lasko Products, LLC*